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9 Attorney for Defendant Imperial Pacific International (CNMI), LLC

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12 **IN THE UNITED STATES DISTRICT COURT**  
13 **FOR THE NORTHERN MARIANA ISLANDS**

14  
15 JAMES WHANG, dba SOUTH PACIFIC  
16 LUMBER COMPANY,

Civil Case No. 1:21-cv-00027

17 Plaintiff,

**DEFENDANT'S WITNESS LIST**

18 vs.

19 IMPERIAL PACIFIC INTERNATIONAL  
20 (CNMI), LLC,

21 Defendant.

22  
23 Defendant Imperial Pacific International (CNMI), LLC (“IPI”), by and through its  
24 undersigned counsel, hereby serve this witness list on Plaintiff James Whang pursuant to the  
25 Court’s Final Pretrial Order. Defendant reserves the right to call any witnesses identified in  
26 Plaintiff’s Witness List. Defendant reserves the right to supplement this list to include witnesses  
27 to rebut the testimony of any witnesses subsequently disclosed by Plaintiff.

28 Defendant hereby identifies the following Fact Witness, whose testimony may be elicited  
29 at trial. The subject matters identified herein are stated to the best of Defendant’s current ability.

| 24 NAME       | 25 ADDRESS  | 26 EXPECTED TESTIMONY  |
|---------------|---|--|
| 27 How Yo Chi | 28 Imperial Pacific International<br>29 (CNMI), LLC, c/o San Nicolas<br>Law Office, LLC | Mr. Chi may testify about<br>Defendant’s lack of access<br>and possession of the<br>premises during the alleged<br>holdover tenancy. |

Respectfully submitted this 2<sup>nd</sup> day of December, 2022.

/s/ Joey P. San Nicolas

JOEY P. SAN NICOLAS (F0342)  
Attorney for Defendant Imperial Pacific  
International (CNMI), LLC